

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

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UNITED STATES OF AMERICA <i>ex rel.</i>	)	
BROOK JACKSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 1:21-cv-00008-MJT
	)	
VENTAVIA RESEARCH GROUP, LLC;	)	
PFIZER, INC.; ICON, PLC	)	
	)	
Defendants.	)	
	)	

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**DECLARATION OF MEAGAN D. SELF REGARDING REPLY IN SUPPORT OF  
PFIZER'S MOTION TO STAY DISCOVERY**

Meagan D. Self declares pursuant to 28 U.S.C. § 1746:

1. I am a member of the bar of the State of Texas and am admitted to the bar of this Court. I am an attorney with the law firm of DLA Piper LLP (US), attorneys for Defendant Pfizer Inc. (“Pfizer”) in this action.

2. This declaration, together with the attached exhibits, is being submitted in connection with the Reply in Support of Pfizer’s Motion to Stay Discovery, filed June 7, 2022 (the “Reply”).

3. The Reply references documents not previously filed on this Court’s docket.  
4. Pfizer submits as exhibits to this Declaration the following documents referenced below:

- a) Attached hereto as Exhibit A is a true and correct copy of Brook Jackson’s May 30, 2022 Twitter post stating “Pfizer recently called me anti-government and an anti-vaxxer w/an agenda. When it comes to this you’re damn right!”

- b) Attached hereto as **Exhibit B** is a true and correct copy of Brook Jackson's May 31, 2022 Twitter post stating "there is zero rationale for keeping [Pfizer's vaccine] on the market" because, in her view, it is "defective & harmful."
- c) Attached hereto as **Exhibit C** is a true and correct copy of Brook Jackson's May 31, 2022 "retweet" of a Twitter post from her counsel (@barnes\_law), which suggests COVID-19 vaccines kill far more people annually than assault rifles do.
- d) Attached hereto as **Exhibit D** is a true and correct copy of Brook Jackson's June 2, 2022 Twitter post about the CDC and FDA stating "'take them down to the very studs and fumigate them, fire all top level people...and run them out of dodge.'"
- e) Attached hereto as **Exhibit E** is a true and correct copy of Brook Jackson's January 17, 2022 Twitter post containing an image of the caption page from her pending qui tam complaint.
- f) Attached hereto as **Exhibit F** is a true and correct copy of Brook Jackson's January 17, 2022 Twitter string, which posts content from her complaint summarizing its core allegations and legal theories.
- g) Attached hereto as **Exhibit G** is a true and correct copy of Brook Jackson's counsel's May 27, 2022 Twitter post stating "Pfizer counsel's claim in court: Even if Pfizer made false statements about vaccine, it doesn't matter because Feds would have given Pfizer \$2Billion anyway!"
- h) Attached hereto as **Exhibit H** is a true and correct copy of Brook Jackson's May 27, 2022 "retweet" of her counsel's Twitter post quoted above in association with Exhibit G.

i) Attached hereto as **Exhibit I** is a true and correct copy of Brook Jackson's May 27, 2022 Twitter post stating "Judge wants to allow us at least the discovery we need to oppose the motion to dismiss, and maybe a bit more, and is open to the possibility the case goes to trial... We move on, people! YES!!"

Dated: June 7, 2022  
Dallas, Texas

*s/ Meagan D. Self*  
Meagan D. Self

# Exhibit A

← Tweet



Brook Jackson 🐱‍💻 💜  
@IamBrookJackson

...

Pfizer recently called me anti-government and an anti-vaxxer w/an agenda. When it comes to this you're damn right!

Oh, and the “landmark” clinical trial you described in court will never carry the meaning you intended! Never!



[amgreatness.com](http://amgreatness.com)

Whistleblower's Lawyer: Pfizer Got Away With Vaccine Fraud Because Govern...

Pfizer has asked a U.S. court to throw out a whistleblower's lawsuit on the basis that the company can't be guilty of fraud, abuse, and protocol violations in its ...

11:24 PM · May 30, 2022 · Twitter for iPhone

870 Retweets 52 Quote Tweets 1,865 Likes



# Exhibit B

← **Tweet**



Brook Jackson 🌈 💜  
@IamBrookJackson

...

Actually, there is zero rationale for keeping this product on the market. It is defective & harmful.

And the FDA can't recall it nor can it force Pfizer to do it.

The agency can only recommend a recall. The manufacturer must initiate it.



Joanna Baron @jobearon · May 30

There is currently zero scientific rationale for keeping the vaccine requirement for travel in place. A purely punitive policy. [twitter.com/MelissaLantsma...](https://twitter.com/MelissaLantsma...)

10:20 AM · May 31, 2022 · Twitter for iPhone

135 Retweets 2 Quote Tweets 374 Likes

# Exhibit C

← Tweet

Brook Jackson Retweeted



Robert Barnes  
@barnes\_law

...



People killed with rifles in 2020

454



Covid vaccine deaths in 2021

20,622

SOURCE: FBI CRIME REPORT (FBI.GOV)

SOURCE: VAERS.HHS.GOV

vivabarneslaw.locals.com

If number of deaths is your metric, maybe rethink your focus?!

Connect with VivaBarnesLaw and other members of VivaBarnesLaw community

7:24 PM · May 31, 2022 · Twitter for Android

758 Retweets 39 Quote Tweets 1,660 Likes

# Exhibit D

← Tweet



Brook Jackson 🎨 ❤️  
@IamBrookJackson

...

“CDC, NIH, FDA, NIAID, take them down to the very studs and fumigate them, fire all top level people, fire them, no pensions, and run them out of dodge. ” - Dr. Paul Alexander



palexander.substack.com

Dr. Paul E. Alexander: the entire field of evidence-based medicine & Public health (PH) killed itself over COVID; it fell in love then committed suicide, PH is pure garbage, U of ...

10:00 PM · Jun 2, 2022 · Twitter for iPhone

120 Retweets 5 Quote Tweets 279 Likes

# Exhibit E

← Tweet



Brook Jackson 🐶 💜 @IamBrookJackson · Jan 17

...

Defendants' false records went to the very essence of the bargain the United States contracted for. DoD contracted to purchase vaccines found effective by a valid clinical trial conducted according to the protocol submitted by Pfizer. The integrity of the entire clinical trial 1/



4

15

29



Rui @Sruiruim · Jan 17

...

@IamBrookJackson what am I reading?



1

15

1



Brook Jackson 🐶 💜

...

@IamBrookJackson

Replying to [@Sruiruim](#)

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

UNITED STATES OF AMERICA  
*ex rel.* Brook Jackson,  
Plaintiff,

VINTAVIA RESEARCH GROUP, LLC;  
PFIZER INC.; ICON PLC.,  
Defendants.

RELATOR BROOK JACKSON'S  
ORIGINAL COMPLAINT FOR  
VIOLATIONS OF THE FEDERAL  
FALSE CLAIMS ACT

**FILED UNDER SEAL**  
PURSUANT TO 31 U.S.C. § 3730(b)

CASE NO. \_\_\_\_\_

DO NOT PUT ON PACER

DO NOT PLACE IN PRESS BOX

9:48 PM · Jan 17, 2022 · Twitter Web App

10 Likes

# Exhibit F

← Thread



Brook Jackson 🐶 ❤️ @IamBrookJackson · Jan 17

Defendants' false records went to the very essence of the bargain the United States contracted for. DoD contracted to purchase vaccines found effective by a valid clinical trial conducted according to the protocol submitted by Pfizer. The integrity of the entire clinical trial 1/



4

15

29



Brook Jackson 🐶 ❤️ @IamBrookJackson · Jan 17

was compromised by the trial protocol violations, false source documents, and the false data that resulted, which calls the vaccine's EUA into question. 2/



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Brook Jackson 🐶 ❤️ @IamBrookJackson · Jan 17

The EUA Pfizer obtained is based on a deeply flawed clinical trial that violated FDA regulations and the clinical trial protocol Pfizer submitted to the United States. This means that the vaccine is misbranded.3/



2

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11



Brook Jackson 🐶 ❤️ @IamBrookJackson · Jan 17

The alleged fraudulent scheme has caused the United States to pay billion that it would not have paid had it known that the safety and efficacy of the vaccine at issue was not accurately represented or properly proven. 4/



1

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17



Brook Jackson 🐶 ❤️

@IamBrookJackson

This means that, at worst, the vaccine could be far less effective than represented, and the United States has paid billions for something that will not protect the public from COVID-19. At best, the vaccine is effective, but Pfizer will still have profited from the pandemic. 5

9:21 PM · Jan 17, 2022 · Twitter Web App

# Exhibit G

← **Tweet**



**Robert Barnes**  
@barnes\_law

...

Pfizer counsel's claim in court: Even if Pfizer made false statements about vaccine, it doesn't matter because Feds would have given Pfizer \$2Billion anyway!

1:08 PM · May 27, 2022 · Twitter for Android

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1,518 Retweets 93 Quote Tweets 3,546 Likes

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# Exhibit H

← Tweet

⤳ Brook Jackson 🌟 💜 Retweeted



Robert Barnes  
@barnes\_law

...

Pfizer counsel's claim in court: Even if Pfizer made false statements about vaccine, it doesn't matter because Feds would have given Pfizer \$2Billion anyway!

1:08 PM · May 27, 2022 · Twitter for Android

---

1,518 Retweets 93 Quote Tweets 3,546 Likes

---



# Exhibit I

← Tweet



Brook Jackson   
@IamBrookJackson

...

Judge wants to allow us at least the discovery we need to oppose the motion to dismiss, and maybe a bit more, and is open to the possibility the case goes to trial.

He also recognized the power gap of so many big law firms on behalf of “you know who”.

We move on, people! YES!!

4:25 PM · May 27, 2022 · Twitter for iPhone

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150 Retweets 12 Quote Tweets 719 Likes